

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)
	)
	)
v.	) Docket No. 1:20-cr-10321-WGY
JOHN BOAMPONG	)
	)
	)

**ASSENTED-TO EMERGENCY MOTION TO PERMIT TRAVEL AND TO  
TEMPORARILY MODIFY SUPERVISED RELEASE CONDITION**

Now comes the defendant, John Boampong, by and through undersigned counsel, and moves this Honorable Court to permit him to travel to Maryland from the morning of April 5 through the evening of April 8, 2024, and to temporarily modify – for the period of his travel – his supervised release condition requiring him to reside at the Coolidge House.<sup>1</sup> Pursuant to Local Rule 7.1, undersigned counsel conferred with counsel for the government and with Mr. Boampong’s assigned Probation Officer and understands that both the government and U.S. Probation assent to this motion. In conferring with Mr. Boampong’s Probation Officer, undersigned counsel understands that a court order is required to permit Coolidge House to hold Mr. Boampong’s placement for his return on April 8, 2024.

As grounds, undersigned counsel states that Mr. Boampong is being supervised on, and is compliant with, conditions of supervised release by U.S. Probation and is presently residing at the Coolidge House. He is working two jobs (one full-time and one part-time) and is actively participating in Operation RENEW.<sup>2</sup> Unfortunately, his father, who lives in Maryland, was

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<sup>1</sup> Counsel understands that in December 2023 the court approved a modification of Mr. Boampong’s supervised release conditions, in anticipation of his release from the Bureau of Prisons in January 2024, to require Mr. Boampong to reside in a Residential Reentry Center (“RRC”) for up to six months, or until such time as he secures housing approved by Probation.

<sup>2</sup> Operation Exit RENEW is an employment/vocational training program co-funded by U.S. Probation and the City of Boston, in partnership with the Gavin Foundation. *See:* <https://www.boston.gov/departments/public-safety/operation-exit->

recently hospitalized after a stroke and he is expected to undergo heart surgery. Mr. Boampong seeks to travel to his father's home in Springdale, Maryland, where he proposes to stay with his stepmother so that he may visit his father in the hospital and be with his family during this difficult time. Specifically, he seeks to travel to Springdale, Maryland on the morning of April 5 and return to Boston on the evening of April 8, 2024. Mr. Boampong proposes to provide the address of his family's residence in Springdale, Maryland to Probation, as well as his itinerary for the proposed travel.

For these reasons and any other the Court deems just, Mr. Boampong requests that he be permitted to travel from the morning of April 5 through the evening of April 8, 2024, and that his supervised release condition requiring him to reside at the Coolidge House be temporarily modified for the period of his travel.

Respectfully submitted,  
 JOHN BOAMPONG  
 By His Attorney,

Dated: 4/3/24

/s/ Sandra Gant  
 Sandra Gant  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 3, 2024.

*/s/ Sandra Gant*  
Sandra Gant